

EXHIBIT A

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ZENIMAX MEDIA INC. and ID SOFTWARE LLC

Plaintiffs,

v.

OCULUS VR, LLC, PALMER LUCKEY AND
FACEBOOK, INC.,

Defendants.

Case No.: 3:14-cv-01849-P

**DECLARATION OF HEIDI L. KEEFE IN SUPPORT OF DEFENDANT
FACEBOOK, INC.'S MOTION FOR PROTECTIVE ORDER**

I, Heidi L. Keefe, declare as follows:

1. I am a partner at the law firm of Cooley LLP, counsel of record for defendant Facebook, Inc. ("Defendant") in the above-captioned case. I make this declaration in support of Defendant Facebook, Inc.'s Motion for Protective Order.

2. I have personal knowledge of the facts recited in this declaration and, if called as a witness, could and would testify competently to them.

3. Plaintiffs have indicated their intention to depose over 20 witnesses as well as taking Rule 30(b)(6) depositions of both Facebook and Oculus.

4. Before taking a single one of these depositions, Plaintiffs unilaterally noticed Mr. Zuckerberg's deposition for December 18, 2015. After receiving the notice, Facebook's counsel asked Plaintiffs' counsel to hold off on the deposition and revisit the issue after they completed other depositions, but Plaintiffs' counsel refused to do so, insisting that Mr. Zuckerberg's deposition go forward as noticed. *See* ECF No. 245 at pp. 5-6.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on November 13, 2015 in Palo Alto, California.

/s/ Heidi L. Keefe
Heidi L. Keefe